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**UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA**

JINJU ZHANG, an individual,

Plaintiff,

VS.

Case No. 23-CV-5818-VC

**PLAINTIFF'S AND DEFENDANTS'
JOINT EXHIBIT LIST**

BENLIN YUAN, an individual; HONG LIN, an individual; CAMIWELL, INC., a California corporation; CAMIWELL, INC. (CANADA), a Canadian corporation; BEIJING ASIACOM TECHNOLOGY CO. LTD., a Chinese corporation; ASIACOM AMERICAS, INC., a Virginia corporation; BANK OF AMERICA CORPORATION, a National Association; and DOES 1 to 20, inclusive,

Defendants.

AND RELATED COUNTER-CLAIM

Plaintiff Jinju Zhang (“Plaintiff”) and Defendants and Counter-Claimants Benlin Yuan and Hong Lin (“Defendants”) identify the following joint exhibits that they intend to offer into

1 evidence at trial. This list does not include exhibits that may be offered for impeachment or
2 rebuttal.

No.1	Description/Bates No.	Purpose and Sponsoring Witness	Stipulation to Admission?	Evidentiary Objection	Response to Objection	Court Use
1	Plaintiff's Notice of Deposition for Camiwell PMK, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
2	Plaintiff's Request for Production to Camiwell, Set Two, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to	

1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25
		3	Plaintiff's Request for Production to Yuan and Lin, Set Two, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.																	
		4	Plaintiff's Request for Production to Yuan and Lin, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.																	

1	5	Plaintiff's Special Interrogatories to Yuan and Lin, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
11	6	Plaintiff's Special Interrogatories to Camiwell, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to what was at issue in the State Action. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
21	7	Plaintiff's Request for Production to Camiwell, Set One, State Action	State Action Discovery; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's	Relevant to what was at issue in the State Action.	

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				Request for Production of Documents served on Nov. 18, 2024	Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
8	Email exchanges among counsel in the State Action, 9/27/2023 – 10/13/2023	State Action Settlement; Padmini Cheruvu	No.	Irrelevant. Hearsay Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to show Plaintiff agreed to settle the dispute. Not hearsay. Cheruvu can testify. Defendants used this exhibit in Cheruvu deposition. Plaintiff did not ask for such information during discovery.	
9	Notice of Acceptance – Yuan and Lin's 998 Offer, State Action, 9/6/2023	State Action Settlement; Benlin Yuan	No.	Irrelevant. Failed to produce in response to Plaintiff's	Relevant to show when Plaintiff accepted	

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				Request for Production of Documents served on Nov. 18, 2024	the 998 offers. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.		
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17	18	19	20	21	22	23	24
25	Notice of Acceptance – Camiwell's 998 Offer, State Action, 9/6/2023	State Action Settlement; Benlin Yuan and Marie Quashnock	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to show when Plaintiff accepted the 998 offers. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.		
11	Deposition Transcript, Marie Quashnock, 2/3/2025	State Action Settlement; Marie Quashnock	Yes.				
12	Lin Deposition Exhibit 3 – 11/24/2018	Camiwell, Inc. dissolution;	Yes.				

1	Shareholder Meeting Minutes	Benlin Yuan and Hong Lin				
2	13	Yuan Deposition Exhibit 24 – Complaint, the State Action	State Action; Benlin Yuan	Yes.		
3	14	Yuan Deposition Exhibit 31 – BOA September 2023 bank statement	Fund withdrawals; Benlin Yuan	Yes.		
4	15	Zhang Deposition Transcript, 8/7/2023, State Action	Shareholder distribution; Jinju Zhang	No.	Irrelevant. Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.
5	16	Yuan Deposition Exhibit 29 – Judgment, State Action	State Action Judgment; Benlin Yuan	Yes.		
6	17	Camiwell 998 Offer Calculation	State Action settlement; Benlin Yuan	No.	Irrelevant. Hearsay Lack of Foundation Failed to produce in	Relevant to show what Camiwell 998 offer consisted of

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				response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Benlin Yuan can testify. Plaintiff did not seek such information during discovery.	
18	Camiwell 998 Offer	State Action settlement; Benlin Yuan	Yes			
19	Yuan and Lin 998 Offer	State Action settlement; Benlin Yuan	Yes			
20	Camiwell 2020 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.	
21	Camiwell 2021 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay	Relevant to shareholder distribution Plaintiff has access to	

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				Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	such information and did not ask for such information during discovery.		
22	Camiwell 2022 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.		
23	Camiwell 2023 bank statements - Bank of America 0628	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information		

1	2	3	4	Request for Production of Documents served on Nov. 18, 2024	5 during discovery.	6
7	8	9	10	11	12	13
14	24	Camiwell 2020 bank statements – Chase 1129	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.
15	25	Camiwell 2021 bank statements – Chase 1129	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.
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23	24	25	PLAINTIFF'S AND DEFENDANTS' JOINT EXHIBIT LIST			
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1	26	Camiwell 2022 bank statements – Chase 1129	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.	
11	27	Camiwell 2020 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.	
21	28	Camiwell 2021 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay	Relevant to shareholder distribution Plaintiff has access to such	

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				Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	information and did not ask for such information during discovery.		
29	Camiwell 2022 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information during discovery.		
30	Camiwell 2023 bank statements - Bank of America 4390	Shareholder distribution; Benlin Yuan	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's	Relevant to shareholder distribution Plaintiff has access to such information and did not ask for such information		

1	2	3	4	Request for Production of Documents served on Nov. 18, 2024	5	6
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31	Camiwell Inc. Bylaws	Zhang's share percentage: Benlin Yuan	Yes.			
32	Written Consent of Shareholders to Voluntarily Wind Up and Dissolve	Zhang's share percentage and dissolution: Benlin Yuan	No.	Hearsay Lack of authenticatio Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Benlin Yuan can testify. Not hearsay. Defendants identified all pleadings and discovery in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
33	Share Transfer Agreement	Zhang's share percentage: Benlin Yuan	Yes.			
34	Notice of Commencement of Voluntary Dissolution	Zhang's share percentage and dissolution: Benlin Yuan	No.	Hearsay Lack of authenticatio Failed to produce in response to Plaintiff's Request for	Benlin Yuan can testify. Not hearsay. Defendants identified all pleadings and discovery	

				Production of Documents served on Nov. 18, 2024	in the State Action. <i>See</i> response to RFP, served on Dec. 22, 2024.	
35	Certificate of Election to Wind Up and Dissolve	Zhang's share percentage and dissolution: Benlin Yuan	Yes			
36	Share Purchase Agreement – Hong Lin	Zhang's share percentage: Benlin Yuan	Yes.			
37	Share Purchase Agreement – Benlin Yuan	Zhang's share percentage: Benlin Yuan	Yes.			
38	Share Purchase Agreement – Jinju Zhang	Zhang's share percentage: Benlin Yuan	Yes.			
39	Amended Notice of Acceptance – Yuan and Lin 998 offer	State Action settlement; Benlin Yuan	Yes.			
40	Amended Notice of Acceptance – Camiwell	State Action settlement; Benlin Yuan	Yes.			
41	Camiwell CPA Invoice	Camiwell, Inc. debt; Benlin Yuan; Chenying Fan; Hui Sun	No.	Irrelevant Hearsay Lack of authentication	Relevant to shareholder distribution. Chenying Fan and Hui Sun can testify.	

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				Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Defendants used this exhibit in Hui Sun deposition. Plaintiff never asked for such information during discovery.	
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42	Statement of Information filed on 7/11/2023	Camiwell, Inc. shareholders; Benlin Yuan	Yes.			
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43	Hui Sun Invoice	Camiwell debt; Benlin Yuan ; Hui Sun	No.	Irrelevant. Hearsay Lack of authentication Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Relevant to shareholder distribution. Hui Sun can testify. Defendants used this exhibit in Hui Sun deposition. Plaintiff never asked for such information during discovery.	
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44	Yuan paid CPA Invoice	Camiwell, Inc. debt; Benlin Yuan; Hui Sun; Chenying Fan	No.	Irrelevant Hearsay Lack of authentication	Relevant to shareholder distribution. Chenying Fan, Hui Sun and Benlin	

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				Failed to produce in response to Plaintiff's Request for Production of Documents served on Nov. 18, 2024	Yuan can testify. Defendants used this exhibit in Hui Sun deposition. Plaintiff never asked for such information during discovery.		
9	45	Third Amended Counterclaim	Shareholder Distribution; Benlin Yuan	Yes.			
10	46	Camiwell 2020 Tax Return	Zhang's share percentage; Benlin Yuan	Yes			
11	47	Camiwell 2021 Tax Return	Zhang's share percentage; Benlin Yuan	Yes			
12	48	Camiwell 2022 Tax Return	Zhang's share percentage; Benlin Yuan	Yes			
13	49	Camiwell LLC DE Formation	Camiwell, LLC formation; Benlin Yuan	Yes			
14	50	Camiwell LLC CA registration	Camiwell, LLC formation; Benlin Yuan	Yes			
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1	51	Statement of Conversion	Camiwell, Inc. formation; Benlin Yuan	Yes			
2	52	Deposition Transcript, Hong Lin, 2/5/2025	State Action settlement and Zhang's share percentage; Hong Lin	Yes			
3	53	Deposition Transcript, Benlin Yuan, 1/31/2025	State Action settlement and Zhang's share percentage; Benlin Yuan	Yes			
4	54	Deposition Transcript, Hui Sun, 2/10/2025	Zhang's share percentage; Hui Sun	Yes			
5	55	Deposition Transcript, Benlin Yuan, 8/3/2023	State Action; Benlin Yuan	Yes			
6	56	Deposition Transcript, Hong Lin, 8/2/2023	State Action; Hong Lin	Yes			
7	57	Deposition Transcript, Benlin Yuan, 8/4/2023	State Action; Benlin Yuan	Yes			
8	101	CAMiWell, Inc. Common Stock Purchase Agreement with Jinju Zhang	Zhang's share of ownership Jinju Zhang	Yes			
9	102	CAMiWell, Inc., Common Stock Purchase Agreement with Hong Lin	Zhang's share of ownership Jinju Zhang	Lack of foundation.		Hong Lin will testify as to its foundation	
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1	103	CAMiWell, Inc., Common Stock Purchase Agreement with Benlin Yuan	Zhang's share of ownership Jinju Zhang	Lack of foundation.		Benlin Yuan will testify as to its foundation.	
2	104	Email from Benlin Yuan dated Dec. 21, 2016	Shareholder distribution Jinju Zhang	Yes			
3	105	Email from Benlin Yuan to Fanling Hu and Jinju Zhang dated March 14, 2017	Shareholder distribution Jinju Zhang	Yes			
4	106	Email to Benlin Yuan from Fanling Hu dated November 27, 2017	Shareholder distribution Jinju Zhang's share of ownership Jinju Zhang	Lack of foundation.		Benlin Yuan will testify as to its foundation.	
5	107	Email from Benlin Yuan to Junfei Li dated July 6, 2018	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
6	108	Email from Benlin Yuan to Fanling Hu dated July 31, 2018	Jinju Zhang's share of ownership. Jinju Zhang	Yes			
7	109	Email from Benlin Yuan to Fanling Hu, copied to Jinju Zhang and Hong Lin dated October 4, 2018	Jinju Zhang's share of ownership.	Yes			

1		Jinju Zhang				
2	110	Letter dated April 14, 2021 from SingerLewak to Benlin Yuan	Jinju Zhang's share of ownership. Jinju Zhang	Yes		
3	111	Letter from Chenying Fan again to Benlin Yuan	Jinju Zhang's share of ownership. Jinju Zhang	Yes		
4	112	April 26, 2023 letter from Chenying Fan to Benlin Yuan	Jinju Zhang's share of ownership. Jinju Zhang	Yes		
5	113	Amended Notice of Acceptance by Plaintiff Jinju Zhang of Defendant CAMiWell, Inc., CCP Section 998 offer to Compromise	Jinju Zhang's share of ownership. Jinju Zhang	Yes		
6	114	Amended Notice of Acceptance by Plaintiff Jinju Zhang of Defendants Benlin Yuan and Hong Lin's CCP Section 998 Offer to Compromise	Jinju Zhang's share of ownership. Jinju Zhang	Yes		
7	115	Judgment in Favor of Plaintiff Jinju Zhang and against Defendant CAMiWell, Inc. Pursuant to Code of Civil Procedure 998 to Compromise	Jinju Zhang's share of ownership. Jinju Zhang	Yes		
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1 2 3 4	116 Bank statement from CAMiWell, Inc. for September 1, 2023 to September 30, 2023	Withdrawal of funds by Benlin Yuan Jinju Zhang	Lack of authenticity Lack of foundation			
5 6 7 8 9 10 11	117 Email threads between Quashnock and Cheruvu dated Oct. 12 - 20, 2023	Unauthorized Withdrawal of funds by Benlin Yuan Jinju Zhang	Lack of foundation		It lays foundation for Plaintiff's claim for unauthorized withdrawal of funds by Benlin Yuan	
12 13 14 15	118 Email threads between Quashnock and James Cai dated Nov. 7, 2023	Unauthorized Withdrawal of funds by Benlin Yuan Marie Quashnock	Yes			
16 17 18 19 20 21 22 23 24	119 E-mail thread dated January 28, 2020 between Bing Zhang Ryan and Padmini Cheruvu	Authenticity of corporate documents of Camiwell, Inc. Padmini Cheruvu	Yes			
25	120 E-mail string dated February 26, 2020 between Bing Zhang Ryan and Padmini Cheruvu	Authenticity of corporate documents of Camiwell, Inc.	Yes			

		Padmini Cheruvu				
121	Exchange Documents Table Exchange Documents Table (Bates Number PC000181)	Authenticity of corporate documents of Camiwell, Inc. Padmini Cheruvu	Lack of foundation		It lays the foundation for Ms. Cheruvu to authenticate the corporate documents received from Bin Zhang Ryan	
122	Declaration of Benlin Yuan in Support of Defendants Benlin Yuan and Hong Lin's Motion for Summary Judgment	Jinju Zhang's share of ownership and withdrawal of funds by Benlin Yuan Benlin Yuan	Yes			
123	Deposition transcript of Marie Quashnock	Jinju Zhang's share of ownership and withdrawal of funds by Benlin Yuan Marie Quashnock	Yes			
124	Deposition transcript of Padmini Cheruvu	Authenticity of corporate documents of Camiwell, Inc. Jinju Zhang's share of ownership and withdrawal of	Yes			

		funds by Benlin Yuan Marie Quashnock			
125	Waiver of Notice and Consent to Unanimous Written Consent in Lieu of Holding First Meeting of Board of Directors dated June 16, 2018	Authenticity of corporate documents. Jinju Zhang	Lack of foundation		It lays foundation for Jinju Zhang to authenticate Camiwell's corporate documents.
126	Secretary of State Certificate of Election to Wind Up and Dissolve	Dissolution of Camiwell, Inc. Benlin Yuan and Hong Lin	Yes		

Defendants reserve the right to add additional exhibits as a result of any witness testimony offered by Plaintiff, to add additional impeachment or rebuttal exhibits, and to withdraw any of the above-mentioned exhibits.

Dated: 04/09/2025 /James Cai/

Attorney for Plaintiff

Dated: 04/09/2025 /Bing Zhang Ryan/

Attorney for Defendants and Counter-Claimants

CERTIFICATE OF SERVICE

I, Christina Ayala, declare:

I am a resident of the State of California and over the age of eighteen years, and not a party to the within action; my business address is 1754 Technology Drive., Suite 122, San Jose, CA 95110. On April 09, 2025, I served the following documents:

- PLAINTIFF'S AND DEFENDANTS' JOINT EXHIBIT LIST

On the party (ies) in this action, through his/her/their attorneys of record, by placing true and correct copies thereof in sealed envelope(s), addressed as shown on the attached Service List for service as designated below:

[] **By US Mail** I placed, on the date shown below, at my place of business, a true copy thereof, enclosed in a sealed envelope, with postage fully pre-paid, for collection and mailing with the United States Postal Service where it would be deposited with the United States Postal Service that same day in the ordinary course of business, addressed to those listed on the attached Service List.

[] (By Overnight Delivery) I enclosed the listed documents in an envelope or package provided by carrier and addressed to the person(s) listed on the attached service. I placed the envelope or package for collection and overnight delivery at an office or a regularly utilized drop box of the overnight delivery carrier.

(By Electronic Service) based on an agreement of the parties to accept service by electronic transmission. I caused the documents to be sent to the person(s) at the electronic notification addresses listed on attached service list, I did not receive within a reasonable time after the transmission and electronic message or other indication that the transmission was unsuccessful.

I am readily familiar with the firm's practice of collection and processing correspondence for mailing. Under that practice it would be deposited with the U.S Postal Service on that same day with postage thereon fully prepaid in the ordinary course of business. I am aware that on motion of the party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after date of deposit for mailing in affidavit.

I declare under penalty of perjury under the laws of the State of California that the above is true and correct. Executed in San Jose, California on **April 09, 2025**.

Christina Ayala

Christina Ayala

SERVICE LIST

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